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13  
**IN THE UNITED STATES DISTRICT COURT**  
 14  
**FOR THE DISTRICT OF ARIZONA**

15 Case No. 2:15-MD-02641-DGC

16 IN RE: Bard IVC Filters Products Liability  
 17 Litigation

18  
**DEFENDANTS C. R. BARD INC. AND**  
**BARD PERIPHERAL VASCULAR**  
**INC.'S REQUEST FOR AN IN-**  
**PERSON STATUS CONFERENCE**

19  
 20 (Assigned to the Honorable David G.  
 Campbell)

21  
 22 The Defendants, C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. hereby submit  
 23 this request for an in-person status conference in this multi-district proceeding. The  
 24 plaintiffs' lead counsel have agreed to this request.

25 At present, the Court has scheduled a telephonic conference for February 1, 2019,  
 26 beginning at 10:00 a.m., to discuss the progress of discovery in the Tinlin bellwether case.  
 27 However, the defendants believe that there are a number of additional issues the parties  
 28 need to discuss with the Court, including (among other things) the Judicial Panel on

1 Multidistrict Litigation's recent Order regarding the Simon Nitinol cases pending in this  
2 MDL; the appointment of lead counsel on behalf of the plaintiffs to oversee those Simon  
3 Nitinol filter cases; a procedure and schedule for completing discovery regarding those  
4 cases; issues regarding the record on remand of the mature cases; and the progress of  
5 settlement discussions among the parties. The plaintiffs would like to discuss the  
6 procedures for eventual remands. The defendants respectfully submit that an in-person  
7 conference (not to exceed two hours) to discuss those issues would assist in advancing this  
8 MDL.

9       The defendants therefore respectfully request – with the consent of the plaintiffs –  
10      that the Court either convert the February 1 status conference into an in-person  
11      conference, or alternatively, schedule an in-person conference for another date or time  
12      convenient to the Court.

RESPECTFULLY submitted this 8<sup>th</sup> day of January, 2019.

/s/ Richard B. North, Jr.  
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**Attorney for Defendants C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.**

1                   **CERTIFICATE OF SERVICE**

2                   I HEREBY CERTIFY that on January 8, 2019, I electronically filed the foregoing  
3 with the Clerk of the Court by using the CM/ECF system which will send notification of  
4 such filing to all counsel of record.

5                   /s/ Richard B. North, Jr.  
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